



RECORD NO: 3

TIME RECORDING AND FLEXITIME MANAGEMENT

Record 3 of processing operation “Time recording and Flexitime management”

Date of last update	08/04/2025
Name and contact details of controller	ENISA, Corporate Support Services Unit (HR), hr-general [at] enisa.europa.eu ,
Name and contact details of DPO	dataprotection [at] enisa.europa.eu
Name and contact details of Joint Controller	N/A
Name and contact details of processor	European Commission, Sysper2 system. A specific SLA between ENISA and the Commission is in place.
Purpose of the processing	<p>The purpose of processing is time recording and recuperation. ENISA uses the European Commission SYSPER 2 “FLEXITIME” submodule which serves for the time recording of all Staff and is related to arrival and departure times.</p> <p>The staff member records the hours worked and the tool will do the calculations automatically. Only the staff member, their hierarchical supervisor and HR (GECOs) have access to this data until their destruction. In the last two cases, they can also modify the data recordings. Recuperation days will be requested and approved by the hierarchical supervisor through the Sysper system.</p> <p>For the purpose of the data accuracy responsibility of the employer for their employees, the reporting officer may in justified cases, after notifying the staff member, request the security officer to provide access data over a limited period of time and data limited to date and time of entering and leaving the premise of the staff member for partial verification of the time recording over a limited period. concerns the planning and organisation of training activities/sessions for ENISA staff and to keep track of trainings received by ENISA staff.</p>
Description of data subjects	The data subjects are Statutory Staff (temporary agents, contract agents) and non Statutory staff (Seconded National Experts).
Description of data categories	<p>Staff name, ID, collection of arrival and departure times split in working hours, core hours and out of hours presence.</p> <p>Recuperation resulting from daily presence data and the results of calculations on monthly Timesheets, particularly regarding the balance of time, credits or debits, compared to the expected amount of hours per month.</p> <p>For the purpose of the data accuracy responsibility of the employer for their employees in justified cases a verification of: data limited to date and time of entering and leaving the premise of the staff member.</p>
Time limits (for the erasure of data)	The time recordings are kept for up to one year after they are produced, unless in the case of legal matters, where data can become an element of the personal file and retention periods of the personal employee file apply.
Data recipients	Within ENISA:



	<p>The personal data of the data subjects is processed by ENISA authorised staff: line manager (reporting officer) of the data subject (Head of Unit), ENISA HR, Director on a need-to-know basis.</p> <p>Within the Commission and other EU institutions/agencies/institutions:</p> <p>Since SYSPER 2 is a tool managed by the European Commission (i.e. DG HR is the system owner and parts of the tasks as subcontracted to DG DIGIT under a separate agreement, such as technical support related to the implementation and operation of SYSPER 2 modules, hosting of SYSPER 2 and other components, analysis of technical nature in relation to providing additional modules and services), there is a controller and processor relationship between ENISA and the European Commission:</p> <ul style="list-style-type: none"> • Controller: ENISA enters data in the system, processes the data and ensures its accuracy. • Processors: DG HR and DG DIGIT maintain the system and provide technical support, business support with relation to the system (e.g. if a specific request could not be solved within ENISA Local Support Team). <p>Authorised staff of the following EU institutions may have access to relevant personal data for audit control or investigation purposes: Court of Auditors, Internal Audit Service of the European Commission, European Anti-Fraud Office (OLAF).</p>
Transfers to third countries	No transfers outside EU/EEA are foreseen.
Security measures - General description	Application and network security measures for Sysper2 - as per relevant policy of the European Commission.
Privacy statement	Available at intranet.

